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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

SINOWA JOHNSON,

Plaintiff,

vs.

NJ TRANSIT BUS OPERATIONS INC.
d/b/a NJ TRANSIT and ATU LOCAL 880,

Defendants.

Case No.: 1:25-cv-02528 (KMW) (EAP)

**LETTER MOTION FOR EXTENSION
OF TIME TO FILE OPPOSITION TO
MOTION TO DISMISS (CONSENTED)**

Dear Judge Elizabeth A. Pascal:

Pursuant to Local Civil Rule 7.1(d)(5), Plaintiff respectfully submits this letter motion to request an extension of time to file her opposition to Defendant's Motion to Dismiss, currently due on June 23, 2025. Plaintiff seeks an extension of sixty (60) days, making the new proposed due date August 22, 2025.

Counsel for Defendant consented to a request for thirty (30) days. This is Plaintiff's first request for an extension related to this motion.

The extension is requested in good faith and will not prejudice either party. It will allow Plaintiff's counsel sufficient time to prepare a complete and thorough response to the arguments raised in Defendant's motion. Indeed, it appears that the Supreme Court of the United States ("SCOTUS") is currently deciding issues directly relevant to Defendants' motion to dismiss. See *Galette v. New Jersey Transit Corp.*, Case No.: [24-1021](#).

We thus respectfully request that the Court grant this request and enter an order extending Plaintiff's deadline to file opposition to the motion to dismiss to August 22, 2025.

Plaintiff thanks this honorable Court for its time and attention to this case.

Respectfully submitted,

Dated: Jamaica, New York
July 28, 2025,

/s/ Emanuel Kataev, Esq.

Emanuel Kataev, Esq.

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